

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,)
Plaintiff,)
-against-) 20-cv-7311 (LAK)
DONALD J. TRUMP, in his)
personal capacity,)
Defendant.)
_____)

CONFIDENTIAL
VIDEOTAPED DEPOSITION OF
E. JEAN CARROLL
New York, New York
Friday, October 14, 2022

Reported By:
CATHI IRISH, RPR, CRR, CLVS

1 CARROLL - CONFIDENTIAL

2 Q. Did you tell anybody you were
3 going to Bergdorf that day?

4 A. I can't recall.

5 Q. I think you answered this but do
6 you remember why you went to Bergdorf that
7 day?

8 A. I was looking for something. I
9 was looking for something. I had -- I
10 wouldn't have driven in and gone shopping
11 unless I had something I wanted to get.

12 Q. Okay.

13 A. I don't remember what it was.

14 Q. How often would you go to
15 Bergdorf?

16 MS. KAPLAN: During this period?

17 BY MS. HABBA:

18 Q. I'm sorry, for this entire line
19 of questioning I'm referring to the
20 incident at hand in your complaint so it's
21 during that period of time.

22 A. This would be special.

23 Q. And just walk me through when the
24 first time you noticed the defendant on
25 the date in question was.

1 CARROLL - CONFIDENTIAL

2 A. I was leaving the store. He was
3 coming in. He held up his hand as I was
4 coming out so I stopped and he came in and
5 he said hey, you're that advice lady.

6 Q. Did you respond to him at that
7 time?

8 A. I said something like hey, you're
9 that real estate tycoon.

10 Q. Had he ever previously referred
11 to you as the advice lady?

12 MS. KAPLAN: Objection to form.

13 BY MS. HABBA:

14 Q. That you know of, I should say.

15 A. I don't know if he has or not.

16 Q. Had you ever heard him call you
17 that in your prior encounters?

18 A. No.

19 Q. Did he gesture at you in any way
20 when he saw you?

21 A. Put up his hand to stop me from
22 going out when he was coming in.

23 Q. Was it a revolving door?

24 A. Yes.

25 Q. So he was on the other side of

1 CARROLL - CONFIDENTIAL

2 the revolving door when he put his hands
3 up?

4 A. He was outside.

5 Q. Just have the record reflect
6 she's putting her hand up.

7 Was defendant accompanied by
8 anyone when he was walking in?

9 A. No.

10 Q. Did he have security?

11 A. No.

12 Q. When you had seen the defendant
13 prior times, did he have security?

14 A. I didn't see any security.

15 Q. Did anyone else recognize the
16 defendant when he came in?

17 MS. KAPLAN: Objection to form.

18 If you know.

19 THE WITNESS: One shopper and a
20 sales attendant.

21 BY MS. HABBA:

22 Q. I'm just going to back up really
23 quickly. So he was outside the revolving
24 door; is that correct?

25 A. (Witness nodded.)

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2 MS. KAPLAN: I'm so sorry.

3 MS. HABBA: She's nodding.

4 THE WITNESS: Yes.

5 BY MS. HABBA:

6 Q. You were inside the revolving
7 door?

8 A. Yes. I was inside Bergdorf's.

9 Q. So when he put his hand up, you
10 were inside the store and he was outside
11 the store; is that correct?

12 A. Yes, yes, because I was heading
13 out through the revolving door. He was
14 coming in so to stop me from coming out
15 the door he went like this (indicating).

16 Q. And put up his hand, for the
17 record.

18 Why did you stop?

19 A. It's the international symbol.
20 It was aimed at me so I stopped.

21 Q. Were there other people walking
22 through the revolving door?

23 A. There were very, very few people
24 in the store.

25 Q. Why was that, if you know?

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2 A. It was evening. It was 6:30,
3 probably going on 7.

4 Q. What happened after he went
5 through the revolving door?

6 A. He said hey, you're that advice
7 lady, and then he said come help me buy a
8 present.

9 Q. And what did you say?

10 A. I was delighted.

11 Q. Why were you delighted?

12 A. I'm an advice columnist, this is
13 my duty.

14 Q. Were you delighted because it was
15 Donald Trump?

16 A. It was a New York scene with
17 Donald Trump asking me to help advise him
18 on getting a present.

19 Q. If it had been anyone other than
20 Donald Trump, would you have done it?

21 A. Absolutely, yes.

22 Q. So you said somebody recognized
23 Donald Trump at that time; is that
24 correct?

25 A. Yes.

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2 Q. You mentioned two people; is that
3 right?

4 A. (Witness nodded.)

5 Q. Can you explain to me when that
6 happened?

7 A. I said handbags. Handbags, that
8 would be perfect. So we entered, we
9 walked, we started walking and he was
10 going to have no part of the handbag
11 thing, so then I said hats because at the
12 time hats and handbags were fairly close,
13 actually mixed together.

14 Q. Was this on the ground floor of
15 Bergdorf?

16 A. Um-hum.

17 Q. When did the first person
18 recognize Donald Trump?

19 A. Well, we were looking at --
20 heading towards the handbags in the area.
21 She gaped up at him.

22 Q. She being a customer or the
23 person that worked there?

24 A. No, customer.

25 Q. Customer. Did she say anything

1 CARROLL - CONFIDENTIAL

2 to him?

3 A. I just remember she was tiny.

4 She was looking up.

5 Q. Did he say anything to her?

6 A. I don't recall.

7 Q. Do you recall what she looked
8 like?

9 A. She was small.

10 Q. Was she white, was she Asian?

11 A. Small. Main thing I remember is
12 her looking up, gaping.

13 Q. But you can't recall what she
14 looked like or what her background was?

15 A. No.

16 Q. When was the next time someone
17 recognized Donald Trump that day?

18 A. A sales attendant.

19 Q. Where was that?

20 A. In the handbags and hats.

21 Q. So that was after the petite
22 female; correct?

23 A. They came roughly at the same
24 time.

25 Q. What did that person say?

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2 A. I do not recall anything specific
3 that she said. She seemed very pleased to
4 see him.

5 Q. Did she help either of you?

6 A. No, we walked past her.

7 Q. Did he acknowledge her?

8 A. In the '90s, he seemed to be very
9 friendly to people so he was like nodding.

10 Q. Do you recall any defining
11 characteristics of the person that helped
12 in the hat or handbag section?

13 A. (Witness nodded.) No.

14 Q. So what happened next?

15 A. I wish I did.

16 Q. So what happened next?

17 A. I had suggested a handbag, he was
18 not interested in the handbag. Oh, before
19 that, I said who is the present for? And
20 he said a girl. And that's why I
21 suggested handbags and he wouldn't do that
22 so I said hats, you can't go wrong with a
23 hat. Look at the hats. So we went to the
24 hats.

25 Q. And I believe you had stated in

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2 your book, which we'll talk about, that he
3 went to a fur hat; is that correct?

4 MS. KAPLAN: You have to say.

5 THE WITNESS: Yes, he went right
6 for the fur hat and was petting it.
7 That is a vision. He had it in his
8 hand.

9 BY MS. HABBA:

10 Q. And then what happened?

11 A. He asked me how old I was.

12 Q. And your response to that was
13 what?

14 A. 52.

15 Q. And what happened after that?

16 A. He told me how old I was. He
17 said you're so old.

18 Q. And what did you say in response
19 to that, if anything?

20 A. I do not recall but I hope it was
21 something saucy.

22 Q. And what happened after that?

23 A. Then he got the idea of lingerie.

24 Q. How do you know that?

25 A. Because he said lingerie. He

1 CARROLL - CONFIDENTIAL

2 said I know, lingerie.

3 Q. Did you ask him to identify the
4 girl that he was shopping for?

5 A. In a roundabout way.

6 Q. What does that mean?

7 A. I asked him how old she was,
8 that's why he asked me how old I was.

9 Q. Did he answer your question?

10 A. No.

11 Q. So the hat and the bags were on
12 the ground level; is that correct?

13 A. Yes.

14 Q. At that point did you leave the
15 ground floor?

16 A. Yes.

17 Q. And where did you go?

18 A. After he said I know, lingerie,
19 we went up the escalator.

20 Q. Do you know what floor you went
21 to?

22 A. I don't recall but it seems to me
23 it was like the sixth floor. It was a
24 long ride.

25 Q. And there was nobody else but the

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2 two of you going up together; is that
3 correct?

4 A. Correct.

5 Q. At any point after you went on
6 the escalator, did you speak to any other
7 staff members of Bergdorf?

8 A. No, we didn't see any other
9 people. We did not see anybody going up
10 the escalator.

11 Q. So you went up six floors in
12 Bergdorf --

13 A. I'm not sure about how many
14 floors. The escalators, it seems like we
15 were on the escalators a long time.
16 That's why I'm thinking it was the sixth,
17 maybe the sixth or seventh floor.

18 Q. What did you talk about on the
19 escalator?

20 A. He was commenting on various
21 things in the store as we rode up.

22 Q. But you didn't see anybody else
23 in the store?

24 A. No.

25 Q. Can you generally describe the

1 CARROLL - CONFIDENTIAL

2 layout of the floor with the lingerie on
3 it once you got there?

4 A. From memory, now I had been in
5 Bergdorf's after this so my vision may be
6 prejudiced but I remember it was on the
7 floor with the cruise section, you know,
8 vacation clothes, bathing suits, and I
9 think evening gowns.

10 Q. Do you remember if the lingerie
11 was close to the escalator when you got
12 off?

13 A. No, we walked to get there.
14 That's why I'm clear that there was nobody
15 on the floor, nobody.

16 Q. When you say nobody on the floor,
17 you mean not even customers?

18 A. Not even customers.

19 Q. So what happens next once you get
20 to the lingerie section?

21 A. There's a -- as you enter the
22 lingerie section on the left there's a
23 counter and on the counter were three or
24 four boxes and there was nobody there.
25 And on the counter was a body suit,

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2 see-through body suit with a little bit of
3 lace on it and he picked it up.

4 Q. So that body suit was just on the
5 counter, it wasn't hanging with the other
6 lingerie?

7 A. No, when we were there, there
8 were no racks, it was just boxes, things
9 were put under a counter, a glass counter.

10 Q. What do you mean by boxes?

11 A. Boxes that held, you know, pretty
12 frilly little items.

13 Q. So was everything on shelves in
14 the lingerie department?

15 A. I only remember the counter.

16 Q. The counter, when you say the
17 counter, you mean the counter where you
18 would check out; is that right?

19 A. Um-hum.

20 Q. And there was one piece of
21 lingerie on that counter?

22 A. Yeah, and a couple of boxes and
23 there may have been lingerie hanging over
24 the right on the racks, I didn't see it.

25 Q. And there was no one on that

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2 It was a counter with boxes and a body
3 suit.

4 BY MS. HABBA:

5 Q. Did the counter display items in
6 it?

7 A. I don't remember seeing things
8 displayed but I don't remember.

9 Q. So what happened after he picked
10 up the lingerie?

11 A. He snatched it up and he said go
12 put this on.

13 Q. What happened then?

14 A. I said you put it on, it's your
15 color.

16 Q. What color was it?

17 A. Gray blue.

18 Q. Gray blue. Do you remember the
19 brand?

20 A. No. It was a very beautiful
21 piece of lingerie though.

22 Q. What did it look like?

23 A. See-through, lilac grayish-blue
24 edged with a little bit of lace, very
25 pretty.

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2 Q. And what type of lingerie was it?

3 A. It was a one-piece body suit.

4 Q. So what happened next?

5 A. He threw it back at me and he
6 said go put this on.

7 Q. Did he hand it to you?

8 A. No, he threw it at me. So I
9 tossed it back to him and said it goes
10 with your eyes.

11 Q. Did he catch it?

12 A. Yeah, he caught it like this
13 (indicating).

14 Q. She can't, she has to articulate.

15 A. He held it like this
16 (indicating).

17 MS. KAPLAN: Videographer, are
18 you getting this all on the video?

19 THE VIDEOGRAPHER: Yes.

20 BY MS. HABBA:

21 Q. He caught it and held it to his
22 chest, is that what you're doing with your
23 hands?

24 A. He went like this and then he
25 held it against my chest and said you're

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2 in good shape, this looks like it might
3 fit you.

4 Q. Okay. And then what happened?

5 A. And then I said but it's your
6 size. This was banter. We're going back
7 and forth. He's saying put this on, I'm
8 saying you put it on. He's saying -- I
9 thought it was an enjoyable repartee.

10 Q. And when you say it was his size,
11 was it a large size piece of lingerie?

12 A. It was a joke to say that.

13 Q. Okay. I just want to clarify for
14 the record.

15 A. No, it was not a huge piece.

16 Q. What happened next?

17 A. And then I said it's your size
18 and he took my arm and he said let's go
19 put this on, and I started laughing
20 because I'm thinking to myself this is
21 hilarious, I'm going to make him put it on
22 over his pants. That's my plan. And then
23 after I make him put it on over his pants
24 I'm going to have a story that I can tell
25 my friends at dinner.

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2 Q. Did you think that Donald Trump
3 would put the piece of lingerie over his
4 pants?

5 A. I did.

6 Q. Did he indicate that to you?

7 A. He was very different. He was
8 not the former president at the time. He
9 was a man about town with a good sense of
10 humor, actually asked me a few questions
11 about myself, was engaged as a human being
12 and not riddled with the cares of an
13 office. He was pretty freewheeling.

14 Q. What kinds of questions did he
15 ask you about yourself?

16 A. How old I was.

17 Q. Anything we haven't discussed
18 yet?

19 A. I think he said something about
20 shopping at Bergdorf's, that he was going
21 to buy Bergdorf's, that he questioned me,
22 do you like this store, I was thinking of
23 buying it.

24 Q. What did you say?

25 A. I said I love Bergdorf's.

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2 Q. When was this conversation?

3 A. Down in the handbags.

4 Q. Any other conversations?

5 A. Yes, there were lots of
6 conversations but I do not recall them. I
7 didn't report anything I didn't remember.

8 Q. So what happened after you headed
9 towards the dressing room?

10 A. Amazingly the dressing room door
11 was open and I am laughing and thinking
12 this is the greatest thing, that when he
13 puts these pants on, I'm going to just --
14 it's going to be great. And he had me --
15 he went like this (indicating). I went
16 into the room.

17 Q. He went like what for the record?

18 A. (Indicating).

19 Q. He gestured for you to go into
20 the dressing room?

21 A. Yes.

22 Q. With his hands?

23 A. Yes.

24 Q. And do you remember what dressing
25 room that was?

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2 A. The first one.

3 Q. The first one where?

4 A. On the left.

5 Q. It was the first on the left. So
6 when you walked into the dressing rooms on
7 this floor with the lingerie, how far were
8 they from the counter?

9 A. Not far. About -- I can't say
10 exactly but it didn't seem far.

11 Q. And do you remember approximately
12 how many rooms were in that dressing area?

13 A. No.

14 Q. You hadn't seen anybody from the
15 time that you got on that floor to the
16 time you got in the dressing room?

17 A. No.

18 Q. There was one dressing room open;
19 is that correct?

20 A. And the body suit was on the
21 counter.

22 Q. Were there any other dressing
23 rooms open?

24 A. I didn't see beyond that.

25 Q. How did you know that that

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2 dressing room was open?

3 A. Because the door was open.

4 Q. Were the other doors closed?

5 A. I don't have a vision of it. I
6 cannot call it up. I can't call it up.

7 Q. How do you know that there wasn't
8 somebody in the dressing rooms?

9 A. I don't know that.

10 Q. Did you hear anybody?

11 A. No.

12 Q. So what happened after he
13 gestured with his hand for you to go into
14 the dressing room?

15 A. It's all one action. I stepped
16 into the room, the door was banged closed
17 and he pushed me up against the wall.

18 Q. I'm just going to slow you down,
19 I apologize, I'm sure this is difficult to
20 talk about but the door was banged you
21 said. Did he slam the door?

22 A. He closed it (indicating).

23 Q. With force?

24 A. He closed it.

25 Q. Did it have a lock on it?

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2 A. I have no idea.

3 Q. Do you remember him locking the
4 door?

5 A. No, I don't believe he locked the
6 door.

7 Q. Was this a wood door that would
8 have hidden the entire room?

9 MS. KAPLAN: Again you have to
10 say.

11 THE WITNESS: I'm just still
12 thinking about your last question.
13 I'm sure he didn't lock it because he
14 immediately pushed me up against the
15 wall so hard that I banged my head so
16 I don't think he was locking it.

17 BY MS. HABBA:

18 Q. Was there a mirror in the room?

19 A. Yes.

20 Q. Where was the mirror in relation
21 to where your head was?

22 A. It was right, there was a chair
23 on the left and I was pushed up against
24 the wall (indicating). If the mirror is
25 here and the chair is here, this wall,

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2 right next to the door.

3 Q. For the court reporter, when you
4 walked into the room the mirror was on
5 your right; is that correct?

6 A. Yes.

7 Q. And to your left is a wall where
8 the chair was; is that correct?

9 A. Yes.

10 Q. And you went straight back
11 against the far wall?

12 A. No, the wall was right next to
13 the door.

14 Q. The wall next to the door where
15 the chair was, is that the wall you're
16 referring to?

17 A. Being the chair was here, this is
18 a wall, the door's here. That's the door
19 to the dressing room.

20 Q. She's pointing to the door.

21 A. Right next to it.

22 Q. So you went to the right of the
23 door of the dressing room?

24 A. To the left.

25 Q. You went to the left of the door

1 CARROLL - CONFIDENTIAL

2 when you walked in and that's where he
3 allegedly pushed you against the wall?

4 MS. KAPLAN: Again you have to
5 say.

6 THE WITNESS: Yes, yes.

7 BY MS. HABBA:

8 Q. Okay.

9 A. There may have been a second
10 mirror but that also may have been a
11 window, I can't remember.

12 Q. Do you remember what the
13 furniture looked like in that room?

14 A. I remember there was a chair and
15 a table, a little tiny table and that's
16 all I remember.

17 Q. Do you remember what the carpet
18 was?

19 A. No.

20 Q. Okay, so after you bumped your
21 head, did you say anything?

22 A. I was so shocked that I didn't
23 speak. What I did was I laughed.

24 Q. Where did you bump your head
25 exactly?

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2 A. Right in the back of it.

3 Q. In the center of it?

4 A. Yes.

5 Q. Did it hurt?

6 A. It hurt. It jolted me and then
7 he pushed me back again and I hit it again
8 for a second time.

9 Q. Was it loud?

10 A. Inside my head, I remember
11 hearing a bang but...

12 Q. Would somebody have heard it if
13 they were in the dressing room next door?

14 A. Yes.

15 Q. Would an attendant have heard it
16 if they were outside the dressing room?

17 A. An attendant would have heard, I
18 believe so.

19 Q. What happened next?

20 A. An attendant would have heard me
21 laughing loudly.

22 Q. I know you've addressed this
23 numerous times publicly but why were you
24 laughing?

25 A. Shock. Trying to recapture the

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2 camaraderie we had and sort of a feeling
3 of a lark, we're on a lark, we're having
4 an adventure, it's a lark, trying to
5 recapture that and take it out of the
6 realm where he had entered, trying to
7 reduce any eroticism about it.

8 Q. Was it erotic?

9 A. Not to me.

10 Q. Was he angry?

11 A. No.

12 Q. What was his demeanor?

13 A. Intent.

14 Q. In any manner did the defendant
15 lunge at you?

16 A. When he pushed me up against the
17 wall, he lunged at me and pushed me up
18 against the wall.

19 Q. What happened next?

20 A. I hit my head twice and then he
21 had his hands on my arms, pushed me back a
22 second time, hit my head and then he put
23 his shoulder into me, and he's a big man.
24 He's -- and he -- guessing 220, maybe 225
25 at the time. I weighed 120. He was 100

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2 more pounds. And that was one of the
3 things that went through my mind was how
4 big and heavy he was because his whole
5 weight came, his shoulder came into me and
6 so at this point I realized it was
7 serious. I was shocked before because he
8 put me against the wall but now I
9 understood that this is -- this is a
10 battle, and he pulled down my tights.

11 Q. Did you feel like he was trying
12 to hurt your head when he --

13 A. No, no. No. He was not trying
14 to hurt me. He was trying to rape me and
15 it was -- it was a situation which I never
16 would have -- when it went from good humor
17 joshing into being up against the wall and
18 then having that heavy weight against me.

19 Q. What did he do after that?

20 A. He pulled down my tights.

21 Q. Had you said anything at this
22 point?

23 A. I cannot believe that I didn't
24 say anything but I don't remember that I
25 said anything. That doesn't mean I didn't

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2 say anything but I -- I can't imagine
3 being quiet. I can't imagine not saying
4 anything but I can't remember saying
5 anything.

6 Q. Did you scream?

7 A. No.

8 Q. Did you push him?

9 A. Yes.

10 Q. Where?

11 A. I had my purse in this hand.

12 Q. In your right hand?

13 A. Right hand. And I tried to get
14 my arms up to push him back, to push him
15 back. The problem was I couldn't get my
16 knee up because the pantyhose had been
17 taken down.

18 Q. So he had hit your head twice
19 prior to taking your pantyhose off
20 according to you; right?

21 A. He didn't take the pantyhose off.

22 Q. He did not?

23 MS. KAPLAN: Again --

24 THE WITNESS: No, he did not take
25 the pantyhose off.

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2 BY MS. HABBA:

3 Q. Okay. So what happened?

4 A. Pulled them down.

5 Q. And then what happened?

6 A. And then I felt his fingers
7 rummaging around my vagina and this huge
8 weight against me. My head hurt, this
9 huge weight, I'm in a situation where I
10 can't -- I can't -- at one point I
11 remember saying this is Donald Trump, what
12 the heck is going on? And then I felt his
13 penis inside of me.

14 Q. So sorry to get into details
15 but --

16 A. No, I understand.

17 Q. If you're against the wall, it
18 was his right shoulder that you are
19 describing was pushing into you?

20 A. Left, I think.

21 Q. His left shoulder, sorry, because
22 you did touch your left side so I assumed
23 it was the right. So it was his left
24 shoulder and he used his right hand?

25 A. I don't know. I couldn't see his

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2 hand.

3 Q. And did you recall at any point
4 him taking his pants off?

5 A. No, no, he didn't take his pants
6 off.

7 Q. He did not take his pants off?

8 MS. KAPLAN: Again --

9 THE WITNESS: No.

10 BY MS. HABBA:

11 Q. So how did you have sex if he
12 didn't take his pants off?

13 A. He took his penis out of his
14 pants.

15 Q. So he only unzipped his pants?

16 A. I don't know. I didn't see the
17 pants. He's leaning, I can't see
18 anything, I've got -- I'm pinned, I can't
19 see down. I don't know if he unzipped
20 them. Obviously he unzipped them because
21 then I felt the penis.

22 Q. Did you feel a belt?

23 A. I -- no, I did not feel a belt.
24 I felt the penis, I felt the fingers
25 first, then the penis.

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2 Q. How long did that last?

3 A. Very short time.

4 Q. Approximately how long do you
5 think?

6 A. Very brief. It was very brief.

7 Q. And then what happened?

8 A. I managed to get my knee up and
9 push off and get him out and push off.

10 Q. And then what happened?

11 A. I went out the door and went
12 away.

13 Q. So before you went out the door,
14 did you put your tights back on?

15 A. No, they were never off.

16 Q. I'm not following, I guess, how
17 he managed to put his fingers on you and
18 have sex with you if he never took them
19 off.

20 A. He pulled them down.

21 Q. He pulled them down. So did you
22 pull them up at any point?

23 A. I don't remember pulling them up
24 but I must have.

25 Q. So when this was done you pulled

1 CARROLL - CONFIDENTIAL

2 your tights back up. I assume you left
3 with your tights on; is that correct?

4 A. (Witness nodded.)

5 MS. KAPLAN: Again you have to
6 say.

7 THE WITNESS: Yes, yes.

8 BY MS. HABBA:

9 Q. Were your tights ripped?

10 A. No.

11 Q. So you pulled your tights back up
12 and exited?

13 A. I don't know if the tights were
14 up. Frankly I don't remember.

15 Q. But you wore them again is my
16 question?

17 A. No.

18 Q. I mean that day, before you
19 exited Bergdorf, did you put them back on?

20 A. They were never off.

21 Q. I think by definition when I say
22 off, I mean pulled down. Did you pull
23 them back up?

24 A. Pulled them back up.

25 Q. And you walked out wearing them;

1 CARROLL - CONFIDENTIAL

2 is that correct?

3 A. Yes.

4 Q. Thank you. So when you pushed
5 him off with your knee, did he back off of
6 you?

7 A. Well, I pushed him with hands and
8 knee and I didn't look to see what he was
9 doing. I turned and got out.

10 Q. Did you scream?

11 A. No.

12 Q. Did you say anything to him?

13 A. No.

14 Q. Did you look at him?

15 A. No, I didn't.

16 Q. Did you kiss him at any point
17 when you were in the dressing room?

18 A. When he -- when we first came in,
19 when he first shoved me against the wall,
20 lunged and shoved me back and I hit my
21 head, he put his mouth against mine.

22 Q. Did you kiss him back?

23 A. I was so shocked I was laughing.

24 Q. When he was kissing you?

25 A. Yes, because I thought this is --

1 CARROLL - CONFIDENTIAL

2 this is -- this is not kosher. I suddenly
3 realized.

4 Q. So you turned around and leave
5 the dressing room and what do you do?

6 A. I believe I went down the
7 escalator which would have been a long
8 ride but I can't imagine finding the
9 elevator, you know, pressing the button.
10 I don't remember that. I do remember
11 going and having the fear that he may --
12 may be coming after me, just slightly in
13 the back of my head.

14 Q. You were worried he would chase
15 you; is that correct?

16 A. (Witness nodded.)

17 MS. KAPLAN: Again, let's get the
18 answer.

19 THE WITNESS: Not chase but come
20 after me.

21 BY MS. HABBA:

22 Q. What do you mean by that?

23 A. Just follow me, maybe grab me
24 again.

25 Q. Did you feel at any point that he

1 CARROLL - CONFIDENTIAL

2 was being violent?

3 MS. KAPLAN: Objection to form.

4 You may answer.

5 THE WITNESS: He was being
6 intense and I never got the impression
7 that he wanted to hurt or that he
8 thought that -- I never got that
9 impression but he had no concern for
10 me. I was just there.

11 BY MS. HABBA:

12 Q. Do you know if he ejaculated
13 inside of you?

14 A. I don't know.

15 Q. Did you see anyone after you left
16 the dressing room?

17 A. Not a soul.

18 Q. And you waited for the elevator
19 -- and I'm sorry, were you done answering
20 or did I interrupt?

21 A. The elevator is a big mystery to
22 me. Would I have waited? I don't know.
23 I don't remember. I suspect that I went
24 down the escalator.

25 Q. You went down the escalator, not